

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

DEUTSCHE BANK NATIONAL TRUST	:	
COMPANY, as Trustee for J.P. Morgan	:	CASE NO. 1:17-cv-0546
Mortgage Acquisition Trust 2007-CH5,	:	
Asset Backed Pass-Through Certificates,	:	JUDGE DONALD C. NUGENT
Series 2007-CH5,	:	
	:	MAGISTRATE JONATHAN GREENBERG
Plaintiff,	:	
	:	
v.	:	
	:	
CHRISTINE J. FORGUES aka	:	
Christine J.A. Andres Doubrava aka	:	
Christine J. Andres, et al.,	:	
	:	
Defendants.	:	

**MOTION FOR PROMPT CASE MANAGEMENT CONFERENCE**

Deutsche Bank National Trust Company, as Trustee for JP Morgan Mortgage Acquisition Trust 2007-CH5, Asset Backed Pass-Through Certificates, Series 207-CH5 (“Deutsche Bank”), respectfully moves the Court to set a Case Management Conference (“CMC”) in this case at the earliest available date on the Court’s schedule. As set forth in Deutsche Bank’s Motion to Remand, Christine J. Forgues (“Forgues”) has filed an untimely notice of removal, some five years after the state court foreclosure action was commenced and nearly four years after a foreclosure judgment was entered. The removal petition on its face fails to establish a basis for

federal jurisdiction, and none of the co-defendants have consented. The removal appears to be another attempt by Forgues to delay execution on a 2013 foreclosure judgment to the prejudice of Deutsche Bank (the previous gambit was the filing of a Chapter 13 bankruptcy that was dismissed seventeen days after filing for failure to file the required supplemental documentation). To the extent the Court does not immediately grant the motion to remand filed contemporaneously with this motion, Deutsche Bank respectfully requests that the Court promptly set a CMC to address these issues.

Respectfully submitted,

/s/ David A. Wallace

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Attorneys for Plaintiff Deutsche Bank National Trust  
Company, as Trustee for JP Morgan Mortgage Acquisition  
Trust 2007-CH5, Asset Backed Pass-Through Certificates,  
Series 207-CH5.

**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing was filed electronically on March 24, 2017. Notice was also sent by operation of the Court's electronic filing system to all other counsel who have entered an appearance and any parties who have entered an appearance through counsel. The parties may access this filing through the Court's ECF system.

A copy was also served on March 24, 2017 by first class U.S. Mail, postage prepaid, upon Christine J. Forgues, 115 Terrace Drive, Johnstown, PA 15904.

/s/ David A. Wallace

Attorneys for Plaintiff The Bank of New York  
Mellon Trust Company N.A., as Trustee for  
IMC Home Equity Loan Trust 1997-3,  
by its Attorney-in-Fact, Select Portfolio Servicing, Inc.